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Ms. Farzana Tabasum
Kirklees Council
Planning Services
PO Box B93
Civic Centre III
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HD1 2JR

31st May 2023

Dear Ms. Farzana Tabasum,

THE PLANNING (HAZARDOUS SUBSTANCES) ACT 1990

THE PLANNING (HAZARDOUS SUBSTANCES) REGULATIONS 2015

RESPONSE TO REQUEST FOR FURTHER INFORMATION MADE BY NORTHERN GAS NETWORKS IN RELATION TO THE SYNGENTA HAZARDOUS SUBSTANCES CONSENT APPLICATION 2023/91265 (NORTHER N GAS NETWORKS REF 140001/8283)

This is a formal response to the concerns that have been raised by Northern Gas Networks in relation to the recent Hazardous Substances Consent Application that was submitted by Syngenta. Please refer to the Consultee Response from Northern Gas Networks that is appended to this letter.

Syngenta made the decision that it would be more conducive to speak to Northern Gas Networks directly. With the view to fully ascertaining their concerns and discussing each one of the stipulations that they have raised to jointly agree whether they are non-applicable, or need to be addressed by the planning, construction and / or subsequent operational processes.

A summary of this discussion is provided below for your records. Note that the stipulations raised by Northern Gas are in the original black and red font with Syngenta's responses in blue font. None of the stipulations made by Northern Gas Networks are applicable, and as such we believe that the objection raised can now be withdrawn. However, if you have any questions, comments or require any further information please do not hesitate to contact me.

The representative from Northern Gas Networks stated that it is their standard response to submit an objection when they receive an application within a certain distance of a gas main. They asked if references to the previous objections raised by Northern Gas Networks could be included in this response to try to prevent further objections. A list of all of the objections made is provided below:

- Hazardous Substances Consent Application 2023/91265 - Northern Gas Networks Objection Ref: 140001/8283
- Pre-planning application for Planning Application 2022/62/93766/W – we do not have a copy of the objection made by Northern Gas Networks

- Hazardous Substances Consent Application 2021/93088 - Northern Gas Networks Objection Ref 1400008729
- Hazardous Substances Consent Application 2021/93088 - Northern Gas Networks Objection Ref 1400014454

1. There are **2 existing** NGN High Pressure Gas Transmission Pipelines which pass close to the development area.

They are as follows:-

a. "Zeneca to Hopton Top" which is 300 mm dia. (12") with 38 bar Max Pressure.

This is registered as a Major Accident Hazard Pipeline and the associated Pipeline Safety Reference for this particular pipeline is 1937.Under the Land Use Planning Regulations, I understand that there will be an HSE consultation distance for this pipeline. (This is the Syngenta CHP gas feed)

(The Pipe is shown in dotted yellow in our MAPS extracts below and is (for the most part) the closest pipeline to your development),For this particular asset, **our safety advice** is based on industry standard (IGEM TD1 Ed. 5), which states that there should be **no "Occupied Buildings"**, within **17 metres** of the pipeline, in other words **a strip 34 metres** wide centred on the pipeline **should be clear of buildings**. This includes any permanent or temporary static caravans).

(Note 2: based on; less than 30% SMYS (Specified Minimum Yield Stress) and material wall thickness of 6.35mm).

This stipulation is not applicable. This application will not result in the installation any new occupied buildings within the stated 17 metres of the described pipeline.

b. " Holidays to Liley Lane " which is 300 mm dia. (12") with 17 bar Max Pressure.

This is registered as a Major Accident Hazard Pipeline and the associated Pipeline Safety Reference for this particular pipeline is 1935. Under the Land Use Planning Regulations, I understand that there will be an HSE consultation distance for this pipeline. (There is a feed off this pipeline into an above ground installation within the Syngenta complex)

(The Pipe is shown in dotted yellow in our MAPS extracts below and is parallel to the pipe above),

For this particular asset, **our safety advice** is based on industry standard (IGEM TD1 Ed. 5), which states that there should be **no "Occupied Buildings"**, within **14 metres** of the pipeline, in other words **a strip 28 metres** wide centred on the pipeline **should be clear of buildings**. (This includes any permanent or temporary static caravans).(Note 3: based on; less than 30% SMYS and material wall thickness of 7.14mm).

This stipulation is not applicable. This application will not result in the installation any new occupied buildings within the stated 14 metres of the described pipeline.

2. **In addition**, from a safety and integrity point of view, we would expect the land owner / developer to abide by the following rules regardless of the absence of **legal rights** along the length of, the above pipelines, Nothing should be placed in or within the access right of way, that would prevent NGN gaining access to the pipe. NGN, as the pipeline owner, should have access to the pipe at all reasonable times and at any time in an emergency to carryout repairs, maintenance and monitoring. The developer in laying out the development must consider NGN's right of access over the adjoining land and along the access strip, so as to facilitate future access for both personnel and machinery.

NGN would expect to be consulted and agree to any other types of structures planned within the access right of way.We would also want to agree to any proposed new services placed within or close the pipeline and if electric conductors, we may require interference testing to be undertaken by the third party in order to ensure there is no related degradation of our pipeline or its protection systems. (such service crossings must be planned to leave a minimum separation distance of 600mm from the pipeline).There are likely to be pipeline related test posts situated close to the pipe and within the development area; NGN would expect that these test posts must remain in situ, or be repositioned at the developers expense. Similarly, NGN would need to agree to any new road proposals within the easement.(If you have not already got access to the related legal agreements and you require them, please get back to me).It is unacceptable for any building to be constructed directly over a High Pressure gas Transmission pipeline.

This stipulation is not applicable. This application will not result in any changes to the current access right of way to NGN.

3. **Again, in addition** to the above proximity distances, since there is **Pressure Reduction equipment** situated within the existing NGN operational compound, there should be no occupied building within **17 metres** of the **NGN compound fence Line** (Ref: IGEM / TD 1 & 13).

This stipulation is not applicable. This application will not result in the installation any new occupied buildings within the stated 17 metres of the described NGN compound fence line.

4. NGN would also want to limit any change in ground levels over and in the vicinity of the existing pipeline (s) to ensure that the existing pipeline depth of cover is not reduced and also that any increase in overburden is limited, such that the total depth of cover is **no greater than 2.5 metres** (as measured from pipe crown to new ground level).

NGN would also need to ensure that any planned retaining walls did not adversely affect the integrity of our pipes, and in order to ensure this was the case, we would want an expert in the relevant field to assess any such proposals.Should percussive piling be necessary, NGN would want to limit any vibration within 15 metres of our pipelines to a measured < 75mm/s ppv.(Please see attached safety document section 8.3).

This stipulation is not applicable. This application will not result any changes to ground levels over or in the vicinity of the existing pipelines.

5. If the development includes any **drainage ponds or Lagoons**, these must not be placed over the pipeline(s) route at any point. (In other words, the pipelines must not be submerged under water). We would want any associated batter or banking be constructed so that it does not encroach into our easement.

This stipulation is not applicable. This application does not include any drainage ponds or lagoons as part of the development.

6. Additionally, for any recreation or landscaped spaces, which are proposed close to our gas pipeline (s), we have tree planting guidelines which advise the types and species which are safe to plant and provide recommended minimum distances for each from the pipe. (the roots of large trees can present a significant safety hazard when wrapped around buried pipes; particularly if the tree subsequently is blown or falls over, pulling the pipe and causing it to rupture). ((Guidelines are attached)).

This stipulation is not applicable. This application does not include any tree planting as part of the development.

7. NGN would want to agree with the developer, any required pipeline protection, should any access points be incorporated over the pipeline(s). (i.e. either Temporary for construction or Permanent street or road access). Such protection for vehicular crossing points is likely to include a specifically designed concrete plinth. If it were to be the case, NGN would be willing to agree tangential or even offset, permanent pipeline road crossing points, so long as any required pipe protection was to an NGN approved design and provided by the developer. (we would expect the developer to include for NGN's design approval process).

This stipulation is not applicable. This application does not require any access points over the pipelines as part of the development.

8. We would also want to agree any safety precautions to be adhered to by **any third parties** carrying out **ground works** in close proximity to our High Pressure Pipelines at any point along their length. This includes the laying and positioning of services as they cross the pipe(s), or placed within the easements. Please see attached document " Working Safely near High Pressure Gas Pipelines"**Prior to groundworks; Existing location & depth of cover must be confirmed by on site measurement by our appointed representative.**

This stipulation is not applicable. This application does have any groundworks in close proximity to the pipelines as part of the development.

9. Please confirm that no explosive Blasting Techniques will be utilised during the construction period.

This stipulation is not applicable. No basting techniques will be utilised as part of this development

Do not hesitate to contact me if you require any further information or would like to discuss any aspects of this submission.

Yours sincerely,
On behalf of Syngenta plc

Michelle Briggs
Safety Manager

Enclosure:

- Northern Gas Networks consultee response